

TASHA PARIS CHALFANT (SBN 207055)
THE LAW OFFICE OF TASHA PARIS CHALFANT
13620 Lincoln Way, Suite 325
Auburn, California 95603
Tel. (916) 444-6100
Fax (916) 930-6093
E-mail: tashachalfant@gmail.com

Attorney for Defendant
DARRYL LYNN KAUFFMAN

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:22-cr-0225 DC
)	
Plaintiff,)	STIPULATION REGARDING
)	CONTINUANCE OF SENTENCING AND
v.)	NEW DISCLOSURE DATES; PROPOSED
)	FINDINGS AND ORDER
DARRYL LYNN KAUFFMAN,)	
)	
Defendant.)	
)	
)	
)	
)	

STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney HEIKO COPPOLA, and the Defendant, DARRYL LYNN KAUFFMAN, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for sentencing before Judge Dena M. Coggins on July 16, 2025. (Docket 46.)
2. By this stipulation, the defendant now moves to reset the sentencing from July 16, 2025 to August 6, 2025, and to reset the formal objections disclosure date.
3. The parties agree and stipulate, and request that the Court find the following:
STIPULATION AND ~~PROPOSED~~ ORDER FOR CONTINUANCE OF SENTENCING

1 a. According to the PSR disclosure dates, the draft PSR was due on April 25, 2025.
2 (Docket 43.)

3 b. On April 28, 2025, the draft PSR was filed. (Docket 45.) Counsel promptly
4 arranged for the draft PSR to be mailed to Mr. Kauffman who was moved to Taft the week of his
5 change of plea. From the date of his arraignment until his change of plea, Mr. Kauffman had been
6 housed at the Sacramento County Jail. Within 7 days of the PSR being filed, Mr. Kauffman
7 received the draft PSR in his legal mail at Taft.
8

9 c. The draft PSR contained significant adjustments/additional specific offense
10 characteristics above the estimated guidelines counsel contemplated in the plea agreement. A
11 significant amount of effort was expended in order to prepare the informal objections with Mr.
12 Kauffman in light of his location at Taft, the voluminous records and the significant increase to
13 his estimated advisory guidelines. Counsel had regular virtual meetings with Mr. Kauffman at
14 Taft, however, the informal objections were not completed in compliance with the disclosure date
15 of May 9, 2025. Counsel was granted a continuance and new disclosure dates were ordered after
16 which Mr. Kauffman's informal objections were filed accordingly.
17
18

19 d. On June 25, 2025, the final PSR was filed. (Docket 48.) Counsel promptly arranged
20 for the final PSR to be mailed to Mr. Kauffman at Taft and a virtual meeting was scheduled. Mr.
21 Kauffman was not made available for this virtual meeting although counsel and the defense
22 investigator remained on the virtual meeting and communicated with Taft seeking our client's
23 status. Ultimately, the facility indicated that Mr. Kauffman was not available. The final PSR
24 contained significant adjustments/additional specific offense characteristics above the estimated
25 guidelines counsel contemplated in the plea agreement, and even more than the draft PSR.
26

27 e. Another virtual meeting was scheduled with Mr. Kauffman on June 26, 2025, and
28

counsel was advised in less than 24 hours before the meeting that Mr. Kauffman was moved from Taft to Yuba County Jail. It was during this time that defense counsel was working out of state on another matter and could have an in-person visit with Mr. Kauffman due to scheduling conflicts. It is unknown whether Mr. Kauffman received the final PSR in his legal mail at Taft before being moved to Yuba County. Now, defense counsel is trying to schedule an in-person visit with Mr. Kauffman in Yuba County which can only happen after the formal objections are due.

f. Counsel for the defendant requires additional time to thoroughly review the final PSR with Mr. Kauffman, research and prepare formal objections, consult with her client and relevant experts, and to discuss the consequences and the significantly higher estimated advisory guidelines.

g. Counsel for the defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

h. The government and probation do not object to the continuance.

i. Based on the above, the defense requests the following new sentencing date along with new disclosure dates:

Reply/Formal Objections: July 30, 2025

Sentencing: August 6, 2025

All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on their behalf.

IT IS SO STIPULATED.

Dated: July 3, 2025

by: /s/Tasha Chalfant for
HEIKO COPPOLA
Assistant U.S. Attorney
Attorney for Plaintiff

STIPULATION AND ~~PROPOSED~~ ORDER FOR CONTINUANCE OF SENTENCING

Dated: July 3, 2025

by: /s/Tasha Chalfant
TASHA CHALFANT
Attorney for Defendant
DARRYL LYNN KAUFFMAN

ORDER

The court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.


The court orders that the sentencing hearing currently scheduled for July 16, 2025, be continued to August 6, 2025, at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins along with the following new disclosure dates:

Reply/Formal Objections: July 30, 2025

Sentencing: August 6, 2025

IT IS SO ORDERED.

Dated: July 6, 2025


Dena Coggins
United States District Judge